

Monsanto

~~JHW~~ / SEATTLE FILE  
HAZ.  
WASTES

NOV 12 1980

FROM  
(NAME-LOCATION-PHONE)

F. J. Kusiak - AA3J - (4-5637)

DATE : November 11, 1980

SUBJECT : By-Product Wastes

REFERENCE : 11-3-80 TT

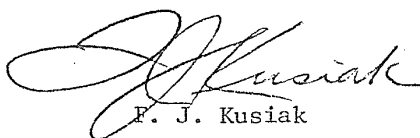
TO : B. Pallante - 1810

CC: W. R. Schaffer - AA3A  
D. M. Gabris - AA3J  
G. W. Kasten - AA3H  
M. Miller - 1810  
J. N. Maguire - G3WA  
M. J. Smid/ O. N. Mueth - AA3D  
K. E. Smith - AA3B

To be in compliance with the DOT/RCRA 11/20/80 deadline in respect to the by-products/wastes listed in reference teletype, we advise as follows:

- o Stop shipments of any or all wastes that are not assessed properly and classified according to DOT/EPA criteria.
- o Pursue strongly processing/updating of TF 837 forms by DMEH through appropriate company EPA/product management personnel.
- o DOT classification, labeling, marking, placarding requirements in transportation for the materials in question are an automatic consequence of the completed TF 837 forms. Packaging needs will be furnished by Packaging Development Section (Smid-Mueth); labeling and marking by Labeling Section (K. Smith); classification by the Transportation Management Section (G. Kasten). Placarding (if needed) will depend on classification.
- o EPA requirements (classification, manifesting, etc.) must be obtained from MIC environmental personnel.

Do not hesitate to call me if the foregoing is not clear.



F. J. Kusiak

FJK/jml

2/XF929/0004/03 10/0501/1/00227/Q2Q45 015-027-011.00-5970CP431

WALLY DRUGLER AASH  
GILL KASTEN AASH  
W.R. SCHAFER EEST

*ESK/DME*  
*Handle with GWK*  
*wrs/11/9/80*

THE SEATTLE PLANT SHIPS THE FOLLOWING BY-PRODUCT WASTES:

PRODUCT/WASTE	METHOD	EPA#	DESTINATION
VBL	RAIL TANK CAR BARGE	D002	PULP MILLS
VBLS	TANK TRUCK	D002	CEMENT COMPANIES LANDFILL
VSB	FLAT BED TRUCK	PRESENTLY BEING DETERMINED	LANDFILL RESIN COMPANIES
MISCELLANEOUS	DUMP TRUCK	PRESENTLY BEING DETERMINED	LANDFILL

#### ADDITIONAL INFORMATION:

VSB

THESE ARE VANILLIN STILL BOTTOMS (VSB) WHICH ARE LIQUID AT 300 DEGREES F. THEY ARE CAST IN 900 LB. BLOCKS, WHICH BECOME SOLID BELOW 150 DEGREES F. THEY ARE PRESENTLY SHIPPED ON A FLAT BED TRUCK TO CHEM NUCLEARS LANDFILL SITE NEAR ARLINGTON, OREGON. APPROXIMATELY 40 BLOCKS ARE SHIPPED PER FLATBED TRUCK PER WEEK. THE PLANT HAS IN THE PAST HAD THIS MATERIAL CRUSHED AND PACKAGED IN 50 LB. BAGS TO SELL AS A PHENOL EXTENDER. THE PLANT IS CURRENTLY TRYING TO DEVELOP THIS MARKET AGAIN AS WELL AS POSSIBLY USING THE MATERIAL IN TAR OR ASPHALT. TO DATE IT HAS NOT BEEN CLASSIFIED HAZARDOUS TO OUR KNOWLEDGE, HOWEVER THE PLANT AND MIC ENVIRONMENTAL GROUPS HAS CHOSEN TO USE CHEM NUCLEARS LANDFILL RATHER THAN MIX MONSANTO WASTE AT A MUNICIPAL LANDFILL.

#### MISCELLANEOUS

THIS WASTE CONSISTS OF A MIXTURE OF USED COPPER SULFATE BAGS, TANK SCALE, BROKEN VSB BLOCKS AND PROCESS STRAINER CLEANINGS. THE WASTE IS PILED IN A CONTAINMENT PIT UNTIL APPROXIMATELY 10 CUBIC YARDS HAVE ACCUMULATED. IT IS THEN PILED IN A DUMPTRUCK BY FRONT END LOADER AND IS HAULED TO CHEM NUCLEARS LANDFILL NEAR ARLINGTON, OREGON. AGAIN, THE INDIVIDUAL COMPONENTS OF THE WASTE HAVE NOT YET BEEN CLASSIFIED. HOWEVER, EP TESTING PER RCRA IS CURRENTLY UNDERWAY.

WITH THE NOV. 19TH RCRA DEADLINE APPROACHING, I WOULD APPRECIATE ANY HELP YOU CAN PROVIDE CONCERNING THE MOVEMENT, LABELING

Monsanto Company 104(e) Response

WASTES ARE NOT ENTIRELY ACCURATE OR UP TO DATE. THERE IS NO TEST FOR MISCELLANEOUS WASTE CURRENTLY ON FILE.

PLEASE ADVISE ME SPECIFICALLY WHAT THE PLANT SHOULD BE DOING TO ATTAIN COMPLIANCE WITH THE RRA NOV. DEADLINE.

B E PALLANTE - SEATTLE PLANT - 11-3-80

MOORE BUSINESS FORMS, INC. 27 MCP PAT. NO. 3,429,827

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